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UNITED STATES DISTRICT COURT  
FOR DISTRICT OF NORTHERN CALIFORNIA

VLADIMIR BALAREZO, ABELARDO  
GUERRERO, VICTOR FUNEZ & OSMIN  
AVILA, and on behalf of other similarly  
situated

Plaintiffs,

vs.

NTH CONNECT TELECOM INC., AND  
STEVEN CHEN,

Defendants

Case No.:C07-05243 JF

**DECLARATION OF ADAM WANG IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
APPROVAL OF *HOFFMANN-LA ROCHE*  
NOTICE**

Date: May 2, 2008  
Time: 9:00 am  
Judge: Honorable Jeremy Fogel

I, the undersigned, declare as follows:

1. I am an attorney duly authorized to practice before this Court and Plaintiffs' attorney of record in this action. I base this declaration on my personal knowledge unless otherwise indicated.

2. I represent another former employee of Defendant Nth Connect Telecom Inc. ("Nth Connect") in another case in this district: *Aranda v. Nth Connect Telecom Inc.* (C06-04738 JSW). I am the lead counsel for Plaintiff in that case.

1           3.       In that case, Defendant Nth Connect's Payroll Supervisor, Danielle Silva, was  
2       deposed.

3           4.       At that deposition, Ms. Silva testified that every job at Nth was assigned a code,  
4       and techs at Nth Connect was paid by piece according to the jib code performed. Attached as  
5       Exhibit 1 is a true and accurate copy of the deposition transcript of Danielle Silva. Her  
6       deposition is admissible in this case as non-hearsay admission.

7           5.       Attached for the convenience of the Court as Exhibit 2 is a true and accurate copy  
8       of a declaration of Defendant Nth Connect's Human Resource Supervisor Linda Francis,  
9       submitted in connection with Defendants' motion to dismiss (Docket # 6).

10          I declare under penalties of perjury under the laws of the United States that the foregoing  
11       is true and accurate.

12          Dated: April 17, 2008

By: /s/ Adam Wang  
Adam Wang